

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**CANAL ELECTRIC COMPANY, CAMBRIDGE)
ELECTRIC LIGHT COMPANY AND)
COMMONWEALTH ELECTRIC COMPANY)**

D.T.E. 02-34

**PETITION FOR LIMITED PARTICIPANT STATUS
BY J. P. MORGAN SECURITIES INC.**

Pursuant to 220 C.M.R. §1.03, J.P. Morgan Securities Inc. (“JPMorgan”) hereby petitions the Department of Telecommunications and Energy (“Department”) for leave to participate as a limited participant in the above-captioned proceeding. In support of its Motion, JPMorgan states the following:

1. On May 17, 2002, Canal Electric Company (“Canal”) filed its Petition for Approval of Asset Divestiture (the “Petition for Approval”) concerning its interest in the Seabrook Nuclear Generating Station (“Seabrook”).
2. Canal, along with Commonwealth Electric Company (“Commonwealth”) and Cambridge Electric Light Company (“Cambridge”) (collectively, the “Petitioners”) also requested that the Department approve an amendment to a certain power contract among the Petitioners relating to Canal’s share of the capacity of Seabrook.
3. As set forth in the Petition for Approval, Canal participated in the sale process together with other joint owners of Seabrook pursuant to a public auction process by which JPMorgan acted as the exclusive asset sales manager, financial advisor and auction advisor for the New Hampshire Public Utilities Commission in coordination with the Connecticut Department of Public Utility Control in conducting said auction sale.
4. JPMorgan has, through Paul M. Dabbar, provided pre-filed testimony in support of the Petition for Approval and is prepared to provide further testimony and/or documentary support as well.
5. Certain information and documents which JPMorgan may be requested to provide in connection with the Petition for Approval is of a confidential and proprietary nature, and, in some cases, was provided to JPMorgan by third parties under contractual terms which restrict the disclosure except upon stated terms and conditions and pursuant to appropriate protective orders and/or confidentiality agreements.
6. In order for JPMorgan to provide appropriate information and/or documents as required in connection with proceedings relating to the Petition for Approval and to

7. JPMorgan maintains a direct and independent interest in protecting confidential information and seeks limited participant status in order to permit it to do so in a responsible and coordinated manner.
8. Canal does not object to this Petition.
9. Consistent with the Department's rules relating to the grant of limited participant status, JPMorgan maintains a substantial and specific interest in both the substantive outcome of this matter as well as procedural issues that may be addressed during the proceeding.

Respectfully submitted,
J. P. MORGAN SECURITIES INC.
By its attorneys,

617/856-8200

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APPEARANCE OF COUNSEL

In the above-entitled proceeding, I, John W. Wadsworth hereby appear for and on behalf of JPMorgan Securities, Inc.

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Date: June 10, 2002

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